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14 *Attorneys for Plaintiffs Jane Doe LS 333*
15 *and Jane Doe LS 397*

10 **UNITED STATES DISTRICT COURT**
11 **NORTHERN DISTRICT OF CALIFORNIA**
12 **SAN FRANCISCO DIVISION**

14 IN RE: UBER TECHNOLOGIES, INC.,
15 PASSENGER SEXUAL ASSAULT
16 LITIGATION

Case No. 3:23-md-03084-CRB

**NOTICE OF MOTION AND MOTION TO
WITHDRAW AS COUNSEL FOR
PLAINTIFFS JANE DOE LS 333 AND
JANE DOE LS 397**

17 This Document Relates to:

18 *Jane Doe LS 333 v. Uber Technologies, Inc., et*
19 *al., Case No. 3:23-cv-05930-CRB*

20 *Jane Doe LS 397 v. Uber Technologies, Inc., et*
21 *al., Case No. 3:24-cv-05864-CRB*

Judge: Hon. Charles R. Breyer
Date: November 14, 2025
Time: 10:00 a.m.
Courtroom: 6 – 17th Floor

1 TO ALL PARTIES AND THEIR COUNSEL OF RECORD, PLEASE TAKE NOTICE that as
2 soon hereafter as the matter may be heard, Levin Simes LLP (“Levin Simes”), counsel of record for
3 Plaintiffs Jane Doe LS 333 and Jane Doe LS 397 (“Plaintiffs”), move this Court for an order
4 permitting its withdrawal as counsel for Plaintiffs. This Motion is made pursuant to Local Rule
5 11-5(a) and C. This Motion is based upon this Notice, the below Memorandum in Support and the
6 Declaration of David M. Grimes. A Proposed Order Granting Plaintiffs' Motion is filed
7 concurrently herewith.

8
9 DATED: October 14, 2025

Respectfully Submitted,

10 **LEVIN SIMES LLP**

11 /s/ David M. Grimes

12 William A. Levin

13 Laurel L. Simes

14 David M. Grimes

15 Samira J. Bokaie

16 *Attorneys for Plaintiffs Jane Doe LS 333 and*
17 *Jane Doe LS 397*

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1 **I. INTRODUCTION**

2 Professional considerations require that counsel withdraw from further representation of
3 Plaintiffs Jane Doe LS 333 and Jane Doe LS 397. Continuing representation would be inconsistent
4 with counsel's obligations under the California Rules of Professional Conduct.

5 This motion is made pursuant to Civil Local Rule 11-5(a), which provides that counsel
6 may not withdraw until relieved by order of the Court after written notice to the client and other
7 parties who have appeared.

8 **II. APPLICABLE RULE**

9 Local Rule 11-5(a) provides that counsel may not withdraw from an action until relieved
10 by order of court after written notice is given to the client and to all other parties who have
11 appeared. If withdrawal is not accompanied by substitution of counsel or the client's agreement to
12 appear pro se, the Court may condition relief on warning the client that failure to act may lead to
13 dismissal or default. (Civ. L.R. 11-5(b).)

14 **III. GROUNDS FOR WITHDRAWAL / BASIS FOR MOTION**

15 Counsel and client have experienced an irreconcilable breakdown in communication and
16 cooperation that makes continued representation unreasonably difficult. Accordingly, withdrawal
17 is appropriate under California Rule of Professional Conduct 1.16(b)(4) and Civil Local Rule 11-
18 5(a).

19 Counsel has already taken steps to preserve the client's interests, including providing
20 notice to the client of the need to obtain substitute counsel or appear pro se, and notifying
21 opposing counsel.

22 **IV. CONCLUSION**

23 For all of the foregoing reasons, counsel respectfully requests that the Court grant leave to
24 withdraw as counsel of record for Plaintiffs Jane Doe LS 333 and Jane Doe LS 397, condition
25 such withdrawal (if needed), and relieve counsel from further responsibility in this case except for
26 such forwarding of notices as ordered.
27
28

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DATED: October 14, 2025

Respectfully Submitted,

LEVIN SIMES LLP

/s/ David M. Grimes

William A. Levin

Laurel L. Simes

David M. Grimes

Samira J. Bokaie

*Attorneys for Plaintiffs Jane Doe LS 333 and
Jane Doe LS 397*

CERTIFICATE OF SERVICE

I hereby certify that on October 14, 2025, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will automatically send notification of the filing to all counsel of record.

By: /s/ David M. Grimes

David M. Grimes

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